

Annual 64.2009(e) CPNI Certification for 2010
Covering the Prior Calendar Year 2009
EB Docket 06-36

Date filed: March 1, 2010

Name of company covered by this certification: VoicePulse, Inc.

Form 499 Filer ID: 825324

Name of signatory: Chris Silk

Title of signatory: Chief Executive Officer

I, Chris Silk, certify that I am an officer of VoicePulse, Inc. (the "Company"), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, recordkeeping and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The Company represents and warrants that the above certification is consistent with 47. C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed  _____

Chris Silk
Chief Executive Officer
VoicePulse, Inc.

VOICEPULSE'S STATEMENT OF CPNI COMPLIANCE PROCEDURES

VoicePulse is a small company with fourteen (14) employees that provides interconnected Voice over Internet Protocol ("VoIP") services. The Company has consistently protected its customers' CPNI from unauthorized access, use and disclosure, in substantive compliance with the Commission's Rules. Specifically, the Company has the following operational procedures that protect its customers' CPNI.

VoicePulse does not currently use CPNI for marketing purposes but has adopted a policy governing its use that conforms to the FCC rules. For instance, VoicePulse will provide regular written CPNI notices to all customers and will obtain approval from all customers prior to using CPNI for marketing purposes. VoicePulse will also provide customers with the ability to change or rescind their consent to the company's use of their CPNI at any time. VoicePulse will draft CPNI notices explaining to customers their CPNI rights in accordance with the FCC's CPNI Rules, including their right to restrict the use and disclosure of, and access to their CPNI. These notices will also provide information on how customers can choose to not receive marketing from VoicePulse that is based upon VoicePulse's use of their CPNI. If VoicePulse uses CPNI to market communications-related services outside of those services to which a customer already subscribes, VoicePulse will only do so where the customer has granted approval pursuant to instructions in the CPNI notices. VoicePulse will adopt a recordkeeping system so as to maintain records of customer approval and the delivery of its CPNI notices for at least one year.

VoicePulse will implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use or disclosure of that customer's CPNI. In accordance with the CPNI rules, upon obtaining a customer's oral authorization, customer service representatives of VoicePulse may access a customer's CPNI during the course of an inbound or outbound telephone conversation, solely for the duration of that conversation. Each such VoicePulse representative must provide the disclosures required by 64.2008(c) of the CPNI rules including informing customers of their right to deny access to the CPNI before requesting this one-time consent.

VoicePulse may, as permitted by the CPNI rules, use CPNI without customer approval (1) to bill and collect for services rendered; (2) to protect the rights or property of VoicePulse, other users or other carriers from unlawful use; (3) to provide customer premises equipment and protocol conversion; (4) to provision inside wiring, maintenance and repair services; and (5) to market services formerly known as adjunct-to-basic services.

VoicePulse does not share, sell, lease or otherwise provide CPNI to any third parties for the purposes of marketing any services. Sharing, selling, leasing or otherwise providing CPNI to any third parties is strictly prohibited by VoicePulse.

VoicePulse will maintain a record for at least one year of its own and affiliates' sales and marketing campaigns that use customers' CPNI should the company use CPNI for such purposes. VoicePulse will establish a supervisory review process to ensure any marketing campaigns are consistent with the FCC's CPNI rules prior to engaging in such campaigns.

All VoicePulse employees who have access to CPNI receive training about CPNI compliance. There are only seven (7) employees that have such access. All new employees are provided with CPNI training at new-hire orientation. Moreover, a summary of VoicePulse's CPNI policies are included in its Employee Handbook, and all employees are required to acknowledge in writing that they have read and understand the information in the Employee Handbook. All VoicePulse employees are required to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by VoicePulse. Employees who do not abide by these policies or otherwise permit the unauthorized use or disclosure of CPNI will be subject to discipline, including possible termination.

VoicePulse has in place procedures to ensure that it will provide written notice to the FCC within five business days of any instance where its opt-out mechanisms do not work properly to such a degree that its customers' inability to opt-out is more than an anomaly. These procedures ensure that the notice will be in the form of a letter, and will include: (i) VoicePulse's name; (ii) a description of the opt-out mechanism(s) used; (iii) the problem(s) experienced; (iv) the remedy proposed and when it will be or was implemented; (v) whether the relevant state commission(s) has been notified; (vi) whether VoicePulse has taken any action; (vii) a copy of the notice provided to customers; and (viii) contact information. VoicePulse will submit the above letter even if it offers other methods by which its customers may opt-out.

VoicePulse has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, VoicePulse will notify affected customers after waiting the relevant time period. VoicePulse will maintain a record of any CPNI-related breaches for a period of at least two years.

VoicePulse has implemented procedures whereby it will not provide CPNI without proper customer authentication. VoicePulse never provides such information over the phone or via electronic mail. Customers that call the Company requesting CPNI or other call detail records ("CDR") are directed to the Company's website where customers must log in to their accounts in order to view their bills. When customers initially signup for service, a randomly generated password composed of a series of alphanumeric characters is provided to the customer. Once the customer signs in, they can change it. for both inbound telephone calls and online account access. VoicePulse has implemented a backup method for allowing customers to change passwords in the event that passwords are lost or forgotten that conforms to the relevant FCC rules.

Internal access to CDRs is limited to billing, technical and management personnel that require access to such records as part of their duties. In order to access CDRs, authorized employees must enter a password. Company employees access customer billing records through an internal Customer Service application, which requires individual login/password authentication, and can only be accessed from computers physically in the VoicePulse offices.

As set forth above, VoicePulse has a history of protecting CPNI and takes this obligation seriously. Consistent with the intent and goals of the CPNI rules, the Company has and will continue to safeguard and protect its customers' CPNI.